ANDREWS & KURTH L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

ATTORNEYS

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October 31, 1994

Ms. Linda Beasley U.S. Environmental Protection Agency Emergency Support Section (HSE-SJ) 77 West Jackson Boulevard Chicago, Illinois 60604

Re: CCCI Superfund Site

Gary, Indiana

Dear Ms. Beasley:

On behalf of U.S.S. Lead Refinery, Inc. ("the Company"), I hereby acknowledge receipt of EPA's letter, dated September 28, 1994, identifying the Company as a potentially responsible party ("PRP") under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") for the Conservation Chemical Company of Illinois, Inc. ("CCCI") site located in Gary, Indiana. The Company intends to participate in negotiations to resolve any potential responsibility in connection with the CCCI site and plans to attend the "kick-off" meeting for the site scheduled for November 10, 1994 in Chicago. The Company's willingness to participate in this process does not constitute an admission of any liability under CERCLA in connection with this site.

Please direct all further correspondence, inquiries, or notices regarding this site to me. If you have any questions or would like additional information, please contact me.

Sincerely

Jeffery S. Hannapel

Counsel for U.S.S. Lead Refinery, Inc.

Mr. Michael W. Baum cc:

ANDREWS & KURTH L.L.P.

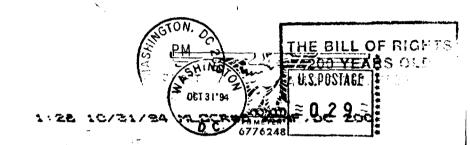
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